

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION  
JOSEPH R. GOODWIN  
UNITED STATES DISTRICT JUDGE

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IN RE: AMERICAN MEDICAL  
SYSTEMS, INC., PELVIC REPAIR  
SYSTEM PRODUCTS LIABILITY  
LITIGATION

MDL No. 2325

Honorable Joseph R. Goodwin

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ELIZABETH J. WILLET and JAMES E.  
WILLET

**CASE NO. 2:13-cv-01573**

Plaintiffs,

v.

JOHNSON & JOHNSON; ETHICON,  
INC.; GYNECARE WORLDWIDE, and  
ETHICON WOMEN'S HEALTH AND  
UROLOGY

Defendants.

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**MOTION TO TRANSFER MDL**

COME NOW the Plaintiffs, by and through the undersigned counsel, and move the court to transfer this member case from MDL 2325, In re: American Medical Systems, Inc., Pelvic Support System Products Liability Litigation, to:

MDL 2327 Ethicon, Inc., Pelvic Repair System Products Liability

Plaintiffs herein filed a Complaint in MDL 2325 against American Medical Systems, Inc. and others. Plaintiff later filed an Amended Short Form Complaint that no longer included American Medical Systems, Inc.

Because American Medical Systems, Inc. is no longer a named defendant in this member case, Plaintiffs respectfully request that the Court: 1) **GRANT** the Plaintiffs' motion to transfer this civil action from MDL 2325 to 2327; and 2) direct the Clerk to disassociate this civil action as a member case in MDL 2325 and re-associate it with MDL 2327.

Respectfully submitted.

SHUCK LAW FIRM, P.C.

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ATTORNEY FOR PLAINTIFFS,  
ELIZABETH AND JAMES WILLET

### **CERTIFICATE OF SERVICE**

I hereby certify that on January 5, 2015, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this member case.

/s/ Amanda Gibson  
Amanda Gibson  
Paralegal, Shuck Law Firm